

Comments regarding FCC's TRS NPRM (CC Docket No. 98-67):

Please accept this late submission of comments on NPRM No. 98-67 regarding telecommunications relay services (TRS). I heard for the first time about this proposal at the ALDA convention in Chicago over Labor Day weekend. Although I am incredibly grateful for the existence of TRS, I am also painfully aware of the present system's shortcomings and how much better it could be.

My "qualification" for making these comments is that I use TRS extensively, primarily for my job in a large social service agency. I use voice carryover (VCO) exclusively, because my progressive hearing loss has not affected my speech, and I find it faster and somewhat more natural. Because I almost always make my first contact with clients by phone, the performance of my local relay service is an extremely important professional issue for me. If the call does not go well, this is likely to enter into their first impressions of me and my agency.

Section and paragraph numbers below refer to the text of the NPRM as downloaded from the FCC's Internet site. I have tried, where possible, to also refer to the section number of the actual proposed rule.

IIIA: "IMPROVED" TRS

STS, MRS, VRI, and other "improvements" (#s 1-4):

While I generally agree with FCC's suggestions for the incorporation of STS, MRS, and VRI services, and the accompanying change in the wording of the definition of the CA's role, I respectfully echo those who expressed regret that these are the only two "improved" TRS services being considered at this time. Perhaps not at this point in the process, but certainly the next time changes in TRS are being considered, a broader look at "improvements" in services is needed.

The most important improvement to me would be anything that increases speed, to make relay calls a closer "functional equivalent" of voice calls. Having spent part of my professional life being able to make voice calls and part of it dependent on TRS, I can assure you that relay calls, even with VCO, are still nowhere near a "functional equivalent". Technologies that exist right now can be used to increase speed, as Ultratec has pointed out: most noticeably Turbo Code, which is preferred by many TTY-to-TTY callers, and various voice-to-text programs that could be trained to the CA's voice. While the FCC cannot mandate the use of a particular software, it can mandate increased speed, by whatever means the local relay service chooses. Turbo Code is such an obvious one that I still do not understand why it is not used routinely now.

Increasing speed would have several important effects. First, it would bring the pace of conversation closer to a "functional equivalent" as mandated by the ADA. Secondly, it would improve the public reaction to TRS in the hearing population. A common theme in many of the rude comments I get (and yes, I get many) is that "these [relay] calls take forever". Thirdly, increased speed would improve access to voice menu-driven calls, making further accommodations in that realm unnecessary. Fourth, faster, more efficient relay services would make hearing-impaired workers like myself more productive in jobs that involve extensive phone work, and increase the range of employment opportunities.

Emergency Services (#5):

I agree with those who suggest that ANI transmission and uniformity in the handling of emergency relay calls should be mandated. I think it would also be highly worthwhile to consider setting up a second, three-digit relay number for emergencies only, to parallel 9-1-1 services for the hearing. The use of a second line (which would still go to the same relay center) could alert the relay center to the presence of an emergency call before the CA even picks it up. This could be especially important in relay centers that use some sort of automated call answering for routine relay calls, to ensure that emergency calls will be answered immediately. The use of a separate emergency number, coupled with uniform emergency-call protocols, could greatly improve service. I leave the question of whether this is technically feasible to those in the industry.

Enhanced services (#6):

Again, I would like to respectfully echo SHHH's and others' insistence on "functional equivalence" here. This is especially important to me, for both personal and professional calls, in the area of voice-menu operated systems. I agree with FCC's suggestion that the CA should be given the option of asking the TRS user if s/he wants verbatim or a summary, and if s/he is looking for something in particular. I often instruct the CA to do this when I know in advance that I'm going to get an automated answering system. It is not always possible, however, to know in advance that I am going to encounter such a system, and/or which option from the menu I will want to select, especially in very complex systems where there are multiple levels of choice. These systems are becoming increasingly prevalent and, I believe, require the type of "evolution" in TRS services that Congress intended, to match the pace of changing technology. I think that the best long-range resolution of this particular problem would be improved speed, as discussed above. I don't call 900 numbers so I really have no opinion on this issue. I would be hard pressed, however, to see them as part of the "mainstream" of telecommunications that we should be entitled to access to.

IIIB. MANDATORY MINIMUM STANDARDS

Speed of answer (#1):

I strongly support FCC's decision to institute a 10-second maximum wait time, and appreciate the clarification that this must be 10 seconds until a "real" CA answers ready to process the call. I have had considerable trouble having to wait for calls to be processed, especially after I request VCO. I would suggest that FCC make it clear that this applies to VCO and HCO calls too, perhaps making the 10 seconds start at the point at which VCO or HCO is requested.

To AT&T (my state's TRS provider, incidentally), GTE, and others who insist that the 10-second maximum wait is not realistic in terms of cost, I ask, where are their data? I would not believe their claims unless I saw hard numbers proving that such a regulation would unduly increase cost.

CA Quality (#2):

Rather than insisting on a set typing speed, I feel that it would be more realistic and effective for the FCC to consider mandating an overall speed of transmission. As mentioned in my discussion of the need for increased speed above, state relay providers could be free to choose whatever means or technology -- Turbo Code, CA's who type faster, voice recognition software, CART, etc. -- would enable them to meet the speed requirement. This is an issue of overall system quality rather than individual CA quality.

I do feel that there should be a more efficient and publicized means for

consumer reporting of problems with individual CA's; my thoughts on this =
subject appear in my comments on Part IIID, Enforcement and =
Certification, later in this letter. =20

In-call CA replacement (#3):

May I heartily add my support for the rule that a CA must stay with a =
call for at least 10 minutes, and be given the option of finishing up a =
call if s/he feels it would result in better service. I once went =
through two changes in CA during one 30-minute phone call, which did not =
help in making the person I was trying to get some important information =
any more cooperative. Incidentally, I think that TRS providers should =
be given some sort of incentive to find a way to make relay calls =
interactive (so that each person can interrupt the other); I know from =
experience that if this were possible, some of my phone calls would not =
be so long! Again, I would ask those providers who voiced their dissent =
to provide reliable statistics supporting their claims that adoption of =
this rule would be detrimental to employee productivity and the =
maintenance of fair work schedules.

Other standards:

Under Section 64.604, two requirements stand out in my mind as not being =
followed and in need of enforcement if adopted. Under Technical =
Standards (b) (1), it is stated that "TRS shall be capable of =
communicating with ASCII and Baudot format, at any speed generally in =
use". To me, this would imply that Turbo Code, a form of Baudot, should =
be mandated when appropriate. I did not see any reference to Turbo Code =
elsewhere in the NPRM, and remain puzzled about this. As stated before, =
Turbo Code appears to me to be a necessity.

Secondly, under Functional Standards (c) (2), Public access to =
information, it is stated that TRS carriers should inform the public =
about TRS through their phone directories and periodic billing inserts, =
including the listing of TT numbers in regular phone directories. I =
hope that all of this will actually happen someday! NONE of it is =
happening in the state of Illinois right now. I learned almost =
everything I know about TRS from Hitec Group, when I bought my Uniphone =
(a combination TTY/phone) from them. As I stated earlier, the ONLY =
information I ever received from my TRS provider was about user =
profiles. And many people with whom I have come into contact via TRS =
comment on the lack of public awareness of this service and their =
frustration at not understanding it at first.

IIIC: COMPETITION ISSUES

I generally agree with the FCC's proposals on multivendoring (#1). If, =
in time, regular voice phone service switches to multivendor =
arrangements for intrastate calls, I believe that would be the =
appropriate time to seriously consider multivendoring TRS. On the =
subject of transfer of customer profile information when the provider =
changes (#2), I understand the industry's wish for this to remain =
proprietary information, but I would ask that states be required to =
inform all TRS users when the provider changes and alert them to the =
need to submit new customer profiles to the new provider.

IIID: ENFORCEMENT AND CERTIFICATION ISSUES

I hope that FCC will strongly emphasize the proposed changes to Section =
64.605, State Certification (b) (2), requiring TRS providers to have =
adequate complaint-handling procedures AND make them well-known and =
understood by TRS users. In the 2 years that I have been using my =
state's TRS, both personally and professionally, I have received exactly =
one piece of mail from the provider (AT&T). It was an announcement of =
the "new" feature of customer profiles. If they have a complaint filing =
procedure I wouldn't even know that it existed, and I have many =

complaints that I'd like to file if I knew what to do.

I feel very strongly that the greatest weaknesses of today's TRS are 1) lack of consumer input, and 2) lack of quality control. Consumers are the best source of knowledge about what really happens during relay calls, and how often. In an industry that is so new and so rapidly evolving, I would expect consumer satisfaction research to be heavily invested in; to my knowledge, TRS providers have conducted none. I am sure that many consumers, like myself, would be happy to participate in research in the form of logging relay calls for a set period and reporting trends and problems. I may begin to do this on my own just to see if some of the problems I experience frequently are due to specific CA's rather than the system as a whole.

Providers as well as advocacy groups make all sorts of statements regarding what "usually" happens, but rarely have statistics to back them up. GTE's assertion that the rule requiring CA's to stay with a call for at least 10 minutes is "unnecessary" because the "average" call is four minutes is a glaring example. Where are the data to back up these claims? Sprint's brief study of the time it took for VCO calls to be placed is a laudable step, especially as it resulted in a change in service. The extent to which the FCC should become involved in this "quivalence". TRS calls, as they exist today, are not like normal conversation and take some getting used to. Many potential TRS users are being denied "functionally equivalent" access to telephone service either out of unawareness of the existence of TRS, or discouragement with the lack of understanding in the general public. The FCC cannot mandate a change in attitude, but it can help ensure that lack of information is not responsible for negative attitudes or low use of TRS by those who need it.

I would hope that the FCC will continue to look at readily achievable changes in TRS after the present rules and amendments are adopted or discarded. There is so much more to be examined. I hope that increased efforts will be made to make individual TRS users more aware of pending NOIs, NPRMs, and such, and solicit comments from them. It is we, the individual users, who depend on TRS to enhance the quality of our personal and professional lives, and have the greatest investment in seeing improvements made. Thank you for your time and consideration.